

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :
AUTOHAUS ACQUISITION, INC., : CASE NO. 1:09-bk-07158
d/b/a VICTORY VOLKSWAGEN, :
Debtor : CHAPTER 7

: JOINTLY ADMINISTERED TO
: THREE ARROWS ENTERPRISES,
: INC., ET AL
: CASE NO. 1:09-bk-07161

APPLICATION TO EMPLOY A. GIBBS & ASSOCIATES, PC,
AS ACCOUNTANTS TO INVESTIGATE AND ADVISE ON
POTENTIAL INSURANCE CLAIMS REGARDING AUTOHAUS
ACQUISITION, INC., UNIVERSAL UNDERWRITERS INSURANCE
COMPANY AND ZURICH INSURANCE

TO THE HONORABLE ROBERT N. OPEL, II, BANKRUPTCY JUDGE:

COMES NOW, Lawrence G. Frank, Trustee in Bankruptcy in the above-captioned Chapter 7 proceeding, and makes this application, respectfully stating in support thereof:

1. The debtor filed a voluntary Chapter 11 proceeding in this Court on September 16, 2009, indexed to the above number. The case was converted to a Chapter 7 on February 24, 2010.

2. The undersigned was appointed Trustee in the above case on February 25, 2010.

3. The President of the debtor has advised that he believes there may exist potential insurance claims involving Autohaus Acquisition, Inc., Universal Underwriters Insurance Company and Zurich Insurance Company

with respect to one or more employees that have caused financial losses to the debtor.

4. The debtor-in-possession, prior to the conversion to Chapter 7, was in the process of seeking approving of A. Gibbs & Associates, PC, to investigate whether those claims existed and if so to assist in the pursuit of said claims and presentation to the responsible insurance companies.

5. The Trustee has familiarized himself with the possible claims against the above insurance companies and believes it would be in the best interest of the estate and its creditors to engage A. Gibbs & Associates, PC, pursuant to the engagement agreement attached hereto as Exhibit "A" with scope of work attached to said exhibit.

WHEREFORE, the Trustee in Bankruptcy respectfully requests this Honorable Court to enter an Order allowing the employment of A. Gibbs & Associates, PC, pursuant to the engagement agreement and scope of work attached hereto.

RESPECTFULLY SUBMITTED BY:

/s/Lawrence G. Frank
LAWRENCE G. FRANK, ESQUIRE
THOMAS, LONG, NIESEN AND KENNARD
Attorney ID #15619
212 Locust Street, Suite 500
Harrisburg, PA 17101
Ph: (717) 234-7455
Fx: (717) 236-8278
Email: lawrencefrank@earthlink.net

TRUSTEE IN BANKRUPTCY

CERTIFICATE OF SERVICE

AND NOW, this 22nd day of July, 2011, I, Lawrence G. Frank, Esquire, hereby certify that I this day electronically filed the foregoing document with the Clerk of the Bankruptcy Court using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address:

U.S. Trustee - ustpreregion03.ha.ecf@usdoj.gov

And service by United States First Class Mail to:

A. Gibbs & Associates, PC
1060 First Avenue, Suite 400
King of Prussia, PA 19406

/s/Lawrence G. Frank
LAWRENCE G. FRANK, ESQUIRE
THOMAS, LONG, NIESEN AND KENNARD
212 Locust Street, Suite 500
Harrisburg, PA 17101
Ph: (717) 234-7455
Fax: (717) 236-8278
Email: lawrencefrank@earthlink.net

Trustee in Bankruptcy